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Theresa Aguilar Finger, Special Projects Manager, MBA/TM, C.P.A.
Secretary of State
1500 11th Street, 6th Floor
Sacramento, CA 95814
RE: Proposed Trustworthy Electronic or Record Preservation

Dear Ms. Aguilar Finger,

This letter is in response to the notice of Proposed Rulemaking for Trustworthy Electronic Document or Record Preservation. My office has reviewed the recommendations taken from section 5.4.1.4 of "AIIM ARP1-2009" on image formats, which I believe is seriously flawed.

AIIM's suggestion that "the TIFF format be utilized with caution," and that organizations should instead adopt PDF-A as their archival standard, sends the wrong message to technology users and developers in California and the world. Presently there are thousands of state and local government organizations that have selected TIFF as a proven archival standard because it is robust and non-proprietary. In fact, technology providers such as Laserfiche build their software on an open architecture to ensure that system performance is continuously enhanced by advances in hardware, software and communication technologies. Constricting them to use of a proprietary format such as PDF-A stifles software development and inhibits the industry's ability to respond to customer needs.

The City of Gilroy archives all of our legislative documents in the TIFF file format, with documents spanning back to the 1870's, and we continue to have ready access to those images today. We've extended this access to the public, housing these TIFF images in an easily accessible weblink from our City website. Choosing a format such as PDF-A, which is controlled by a single vendor, runs contrary to the principles of long-term preservation and archiving as there is no guarantee that the format will be supported in the years to come, and without this support, these documents may no longer be available to our community members to ensure that this level of transparency in government is achieved.

Conversion of our legislative records to a PDF-A format would also bring upon huge costs to local governments as we have invested time and money in the systems and processes we have in place. Mandating a conversion of these permanent documents to PDF-A would require countless hours of manpower, investments in new hardware and software and training, which we simply do not have.

For these reasons, I am strongly opposed to these proposed regulations and ask that the Secretary of State not adopt them, and take the time to work with local governments to achieve a better solution to this important issue.

Sincerely,

Shawna Freels, CMC
City Clerk, City of Gilroy